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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

LAMBDA LABS, INC.,

Plaintiff,

v.

LAMBDA, INC.,

Defendant.

Case No. 4:19-cv-04060-JST (TSH)

**UPDATED JOINT LETTER BRIEF  
CONCERNING LAMBDA SCHOOL  
DOCUMENT CUSTODIANS**

Judge: Magistrate Judge Thomas S. Hixson

Per the Court's Order (ECF No. 73), the Parties submit this joint report concerning the number and identity of Lambda School document custodians. After additional discussion, the parties were able to resolve their dispute concerning the number and identity of Lambda School custodians.

The parties agree to collect from eleven document custodians per side. For Lambda School custodians, this includes nine custodians plus a "safety net" of two custodians to be named later in discovery. Regarding the identities of the Lambda School custodians, Lambda Labs proposed the following individuals:

1. Austen Allred (Co-Founder and CEO of Lambda School)
2. Ben Nelson (Co-Founder)
3. Trevor McKendrick (Chief of Staff)
4. Adam Grenier (former Vice President of Product and Marketing)
5. Lindsey Monroe (Director – Creative)
6. Joshua Howland (Director – Lambda X)
7. Zoran Martinovic (Vice President of Business Development)
8. Jessica Pense (Director – Student Success)
9. Sabrina Baez (former Head of Career Services) [*to be addressed at a later stage*]
10. [safety net]
11. [safety net]

Lambda School has agreed to collect from custodians #1-6 (Allred, Nelson, McKendrick, Grenier, Monroe, and Howland). Regarding custodians #7 and 8 (Martonovic and Pense), Lambda School believes that the outcome of the disputes to be briefed on June 26 (which relate to complaints regarding Lambda School and related “reputational” evidence) will affect the relevance of documents these custodians may have. Lambda Labs does not necessarily agree, but agrees to defer the issue until after a ruling on the June 26 brief as it may obviate the need for further briefing regarding these two custodians.

Finally, Lambda School objects to collection from custodian #9 (Baez). Lambda Labs has agreed to delay collecting Ms. Baez’s materials until after Lambda School has completed the majority of its document production, which will allow Lambda Labs to evaluate whether production of her materials is required. In turn, Lambda School has agreed to preserve Ms. Baez’s documents.

Lambda Labs has also agreed that Lambda School does not need to collect documents from custodian Caleb Hicks. Lambda Labs further agrees that with the exception of Austen Allred, Lambda School's custodial document sources are from GSuite and Slack for each custodian. Lambda Labs reserves its right to seek collection from additional data sources if discovery later shows they are used and contain relevant materials. The parties further agree that searching local computer drives or external hard drives is not required at this time. The parties agree to defer to the Court's guidance concerning collection of voicemails. The parties have thus resolved their disputes concerning the number and identity of Lambda School custodians for the time being.

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**ATTESTATION**

I, Jennifer Lee Taylor, am the ECF user whose credentials were utilized in the electronic filing of this document. In accordance with Civil Local Rule 5-1(i)(3), I hereby attest that Karineh Khachatourian concurred in the filing of this document.

/s/ Jennifer Lee Taylor  
Jennifer Lee Taylor